CANDIDATE AND LISTING PRIORITY ASSIGNMENT FORM

SCIENTIFIC NAME:	<u>Eriogon</u>	um kelloggii
COMMON NAME:	Red Mountain l	buckwheat
LEAD REGION:	Region 1	
INFORMATION CURRE	ENT AS OF:	January 2002
90-day12-mo Is the pe Listing priorit	ate petition received positive - FR date: nth warranted but p tition requesting a ry change: corner LP: (Cheore abundant or wide ree of threats sufficitinuance of candidate o longer a U.S. terristakenly included in	recluded - FR date: reclassification of a listed species? eck only one reason) espread than previously believed or not subject to a rient to warrant issuance of a proposed listing or atte status.
ANIMAL/PLANT GROU	P AND FAMILY:	Polygonaceae (Buckwheat Family)
HISTORICAL STATES/		UNTRIES OF OCCURRENCE:
CURRENT STATES/TEI Mendocino Count		NTRIES OF OCCURRENCE:
LEAD REGION CONTA Weber (RO) 503-231-613	· •	number):Diane Elam (CNO) 916-414-6464; Wendi
LEAD FIELD OFFICE C Office, David Solis (707)	*	name, phone number): Arcata Fish and Wildlife

BIOLOGICAL INFORMATION (Describe habitat, historic vs. current range, historic vs. current population estimates (# populations, #individuals/population), etc.):

Asa Gray described this taxon in 1870 from specimens that were collected from the type locality by Dr. A. Kellogg at Red Mountain in 1869, Mendocino County, California (Gray 1870).

This species appears to have always been rare, and is currently known from only five occurrences at Red Mountain and Little Red Mountain, Mendocino County, California. This serpentine endemic is found in rocky barren, openings in lower montane coniferous forests between 1,097 and 1,219 meters (3,600 and 4,000 feet) in elevation (California Department of Fish and Game (CDFG) 1997).

Dr. Michael Baad (California State University-Sacramento, pers. comm., 2002) has annually monitored 13.5 square meters (16 square feet) permanent plots on Red Mountain from 1987 to 1998. His research has shown considerable variation in plant density and reproductive success, but no discernible long-term trends (Baad 1998). He did find that this species tends in increase in canopy during wet years. From 1987 through 1998, the plant's populations have experienced little human impact (Baad 1998).

THREATS (Describe threats in terms of the five factors in section 4 of the ESA providing specific, substantive information. If this is a removal of a species from candidate status or a change in listing priority, explain reasons for change):

A. The present or threatened destruction, modification, or curtailment of its habitat or range.

The primary threat to this species is the potential for future mining activities. Although mining does not now occur in the species' habitat, potential future surface nickel and chromium mining threaten this species (Dr. M. Baad, in litt. 1994; CDFG 1997; Finan 1994; Jennifer Wheeler, Bureau of Land Management (BLM), pers. comm., 2001). Whether or not mining occurs depends on the future economic feasibility and demand for minerals.

There are 60 mining claims on Red Mountain, which contains the majority of the Eriogonum kelloggii populations (BLM 2001), but a single claimant holds all of these claims. Most likely, any mining operation on Red Mountain or Little Red Mountain would be an open-face bench type that would involve removal and processing of the mineral-bearing ore which contains the nickel, chromium, and cobalt (BLM) 1988). All vegetation and habitat for Eriogonum kelloggii would be removed. Ore would be processed on public or adjacent private lands. Overburden and processed soil disposal areas would be needed, along with a transportation system, perhaps involving cable trams across Cedar Creek Canyon (BLM 1988). The holder of the mining claims could engage in a validation process of their mining claims and thereby be granted patent to the lands on Red Mountain. If the lands were to be patented into private ownership and mining commenced, neither the Service nor the BLM could offer any protection of the land beyond elevating the profile and plight of the plant species in a proposed or final rule.

Although no scientific evidence is available to suggest such secondary effects, additional biological values of the habitat may be lost through habitat fragmentation, alteration of

hydrology, and increases in airborne particulates that may depress pollinator success (Saunders <u>et al.</u> 1991; Meffe and Carroll 1997).

B. Overutilization for commercial, recreational, scientific, or educational purposes.

None known at this time.

C. Disease or predation.

None known at this time.

D. The inadequacy of existing regulatory mechanisms.

The State of California listed this species as endangered in 1982, but State laws are inadequate to protect this species (Jane Wheeler, BLM, pers. comm., 1994). This plant is not listed as a sensitive species by the BLM.

E. Other natural or manmade factors affecting its continued existence.

The small number of populations and individual plants make this species more vulnerable to random environmental events.

BRIEF SUMMARY OF REASONS FOR REMOVAL OR LISTING PRIORITY CHANGE:

FOR RECYCLED PETITIONS:

- a. Is listing still warranted?
- b. To date, has publication of a proposal to list been precluded by other higher priority listing actions?
- c. Is a proposal to list the species as threatened or endangered in preparation?
- d. If the answer to c. above is no, provide an explanation of why the action is still precluded.

LAND OWNERSHIP (Estimate proportion Federal/state/local government/private, identify non-private owners): One occurrence is in private ownership, one occurrence on a mixture of private and public lands (BLM), and three occurrences on public lands (BLM) at Red Mountain, Mendocino, California. There maybe an additional occurrence on the California Department of Fish and Game reserve at Red Mountain (J. Wheeler, pers. comm., 2001).

PRELISTING (Describe status of conservation agreements or other conservation activities):

There are no conservation agreements currently in place for this species. It is unlikely that the development of a conservation agreement would provide any protection against the future patenting of exiting mining claims. The BLM Arcata Field Office staff and manager support the Service listing the taxon.

It is not believed that the development of a conservation agreement would provide any protection against the future patenting of exiting mining claims.

REFERENCES (Identify primary sources of information (e.g., status reports, petitions, journal publications, unpublished data from species experts) using formal citation format):

- Baad, Michael F. Ph.D. 1994. Species expert, California State University. Personal communication.
 ______. 1994. Species expert, California State University. Letter to the Service dated November 28, 1994.
 ______. 2002. Species expert, California State University. Personal communication.
 ______. 1998. The monitoring of rare plant populations permanent plot studies Red Mountain, Mendocino County, California (draft). Permanent plot study update 1998. Prepared for the Bureau of Land Management, Arcata, California.
- Bureau of Land Management. 1988. Department of the Interior, Final Environmental Impact Statement, Wilderness Recommendations for the Arcata Resource Area, Red Mountain WSA (CA-050-132). 101 pp.
- Bureau of Land Management. 2001. Information from the California State Office.
- California Department of Fish and Game. 1997. Natural Diversity Data Base, Sacramento, California.
- Gray, Asa. 1870. Proceeding of the American Academy of Arts and Sciences. Page 293.
- Finan, Mike. 1994. U.S. Army Corps of Engineers, Sacramento District Office. Personal communication.
- Jones, M.E. 1903. Contributions to Western Botany. 11:4-18.
- Meffe, G.K. and C.R. Carroll. 1997. Principles of Conservation Biology, Second edition. Sinauer Associates, Inc. Sunderland, Massachusetts. 729 pp.
- Saunders, D.A., R.J. Hobbs, and C.R. Margules. 1991. Biological consequences of ecosystem fragmentation: A review. Conservation Biology 5:18-32.
- Wheeler, Jennifer. 1994 and 2001. Botanist, Bureau of Land Management, Ukiah Resource Area Office. Personal communication.

LISTING PRIORITY (place * after number)

THREAT			
Magnitude	Immediacy	Taxonomy	Priority
High	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	1 2 3 4 5* 6
Moderate to Low	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	7 8 9 10 11 12

APPROVAL/CONCURRENCE: Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes to the candidate list, including listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all additions of species to the candidate list, removal of candidates, and listing priority changes.

Approve:	Kenneth McDermond Acting Manager, California/Nevada Operations Fish and Wildlife Service		April 8, 2002 Date
Concur:	Director, Fish and Wildlife Service	Date	
Do not conc	Director, Fish and Wildlife Service	Date	
Director's R	emarks:		
Conducted b	ual review: <u>January 2002</u> by:		